

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

VOICES FOR INDEPENDENCE and	)	Civil Action No. 04-328Erie
PAUL PECUNAS; on behalf of themselves	)	
and all others similarly situated	)	
	)	HON: Sean J. McLaughlin
	)	
	)	
Plaintiffs,	)	MAG. JUDGE:
v.	)	Susan Paradise Baxter
	)	
CITY OF MEADVILLE, PENNSYLVANIA,	)	
	)	
Defendant.	)	

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**MOTION FOR ENTRY OF SECOND CONSENT DECREE**

The parties, by and through their respective counsel of record, do hereby respectfully request that the court enter the attached Second Consent Decree.

Respectfully submitted,

/s/ Craig A. Markham  
Craig A. Markham (38531)  
ELDERKIN, MARTIN, KELLY & MESSINA  
Jones School Square  
150 East Eighth Street  
Erie, PA 16501  
814-456-4000  
814-454-7411 fax  
Attorney for Plaintiffs